

**IN THE UNITED STATES DISTRICT COURT
IN THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WINONA JACKSON,
on behalf of plaintiff and a class,

Plaintiff,

V.

MRC RECEIVABLES CORPORATION;
MIDLAND CREDIT MANAGEMENT, INC.;
and ENCORE CAPITAL GROUP, INC.,

Defendants.

No. 08 C 762

Judge Guzman
Magistrate Judge Mason

**AGREED MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO PLAINTIFF'S CLASS ACTION COMPLAINT**

Defendants, MRC Receivables Corporation (“MRC”), Midland Credit Management, Inc. (“MCM”), and Encore Capital Group, Inc. (“Encore”) (also collectively referred to as “Defendants”), by and through their attorneys, Dykema Gossett PLLC, move pursuant to Fed. R. Civ. P. 6(b), for an enlargement of time for Defendants to respond to Plaintiff’s Class Action Complaint (“Complaint”). In support of their agreed motion, Defendants state the following:

1. Plaintiff filed her Complaint on February 4, 2008.
2. Defendant MCM's response to the Complaint is currently due on March 3, 2008; defendant MRC's response to the Complaint is currently due on March 4, 2008; and defendant Encore's response to the Complaint is currently due on March 5, 2008.
3. Counsel for Defendants was only recently retained and requires additional time to properly investigate the allegations and formulate an appropriate response.
4. On February 29, 2008, Defendants' counsel contacted counsel for Plaintiff who kindly agreed to a thirty (30) day enlargement of time, up to and including April 2, 2008.

5. This request for an extension is not meant for the purposes of undue delay, and no party will be prejudiced by this extension.

WHEREFORE, Defendants request that this Court grant them an enlargement of time up to and including April 2, 2008, in which to respond to Plaintiff's Complaint, and grant such further and additional relief as this Court deems just and appropriate.

Dated: February 29, 2008

Respectfully submitted,

**MRC RECEIVABLES CORPORATION
MIDLAND CREDIT MANAGEMENT, INC.,
and ENCORE CAPITAL GROUP, INC.**

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CERTIFICATE OF SERVICE

I hereby certify that on **February 29, 2008**, I electronically filed the foregoing **Agreed Motion for Enlargement of Time to Respond to Plaintiff's Complaint** with the Clerk of the Court using the ECF system, which sent notification to the following:

Daniel A. Edelman (courtecl@edcombs.com)
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s/ Irina V. Frye
